

## REMARKS

Reconsideration and the timely allowance of the pending claims, in view of the following remarks, are respectfully requested.

In the Office Action of April 7, 2006, the Examiner rejected claims 1-2, under 35 U.S.C. §101, as allegedly being directed to non-statutory subject matter; rejected claims 1-2, under 35 U.S.C. §112, ¶2, as allegedly containing indefinite terms; rejected claims 1-2, under 35 U.S.C. §103(a), as allegedly being unpatentable over Motomura '349 (U.S. Patent No. 5,377,349) in view of Ito '119 (U.S. Patent No. 5,535,119).

The Examiner also objected to the Abstract as allegedly containing more than 150 words and objected to claim 1 as allegedly containing an informality.

By this Amendment, Applicants have amended independent claims 1-2 to provide a clearer presentation of the claimed subject matter. Applicants submit that no new matter has been introduced. Applicants further submit that, by virtue of the changes to claims 1-2, the objections, indefiniteness and non-statutory subject matter rejections of these claims are now moot. Accordingly, Applicants request the immediate withdrawal of the objections and §101 and §112, ¶2 rejections of claims 1-2.

Applicants have also submitted a substitute Abstract that complies with the word count and respectfully request the withdrawal of the objection to the Specification.

Applicants respectfully traverse the prior art rejections, under 35 U.S.C. §103(a), for the following reasons:

### I. Prior Art Rejections Under 35 U.S.C. §103(a).

As indicated above, amended claim 1 is directed to an address recognition apparatus for recognizing an address. Claim 1 now positively recites the use of an address word string dictionary for storing a plurality of first word strings each

constructing an address in which a word arrangement order is determined. Claim 1 further positively recites address word string recognizing means having executable instructions for, *inter alia*, determining words of the second word string respectively corresponding to the words of the first word string based on similarities between the words of the first word string and the words of the second word string, evaluating each of the first word strings based on the number of words between the words of the second word string thus determined and the similarities between the words of the first word string and the words of the second word string determined, recognizing one of the first word strings as the address word string; and outputting the recognized first word string as the address word string. Such features are amply supported by the embodiments described in the written description. (*See e.g.*, Specification: page 16, line 20 – page 29, line 10; FIGs. 5, 10).

In contrast to the Examiner's contentions, there is nothing in the references of record, including the Motomura '349 reference, that teaches the combination of features recited in claim 1, including the features noted above. In particular, Motomura '349 provides a string collating system that evenly extracts all character strings of arbitrary lengths within a predetermined distance from a reference string. (*See, Motomura '349*: col. 2, lines 58-61). In other words, Motomura '349 is directed to matching a character string that comprises a sequence of alphanumeric characters representing a single word with a reference word.

In so doing, Motomura '349 fails to teach or suggest the use of word strings, as required by claim 1. That is, the present invention is directed to recognizing an address and, thus, requires operating on word strings that comprise multiple words (*i.e.*, sentences forming an address). As such, the present invention is not solely limited, as Motomura '349, to output a word that matches a reference word - rather, it is directed to recognizing and outputting one of the first word strings that represent a written address.

Moreover, Motomura '349 also fails to teach or suggest evaluating each of the first word strings based on the number of words between the words of the second word

string thus determined and the similarities between the words of the first word string and the words of the second word string determined, as required by claim 1. That is, because Motomura '349 operates to only match a word, it is devoid of evaluating the *number of words* between the words of the second word string and the *similarities between the words* of the first word string and the words of the second word string determined.

Applicants further submit that the references of record, including Ito '119, do nothing to cure the deficiencies of Motomura '349 identified above. Specifically, Ito '119 is directed to a keyboard entry interface that eliminates the need for switching between language conversion modes. As such, it fails to rectify the failings of Motomura '349.

For at least these reasons, Applicants submit that neither the Motomura '349 nor Ito '119 references, whether taken along or in reasonable combination, teach or suggest the claimed combination of elements recited by amended claim 1. Accordingly, claim 1 is patentable over these references and Applicants request the immediate withdrawal of the prior art rejection of claim 1, under 35 U.S.C. §103(a).

Moreover, because independent claim 2 recites features similar to claim 1 that have been shown to be patentable over the references of record, claim 2 is also patentable for at least the reasons presented with respect to claim 1. Applicants therefore respectfully request the immediate withdrawal of the prior art rejections of claim 2, under 35 U.S.C. §103(a).

## II. Conclusion.

All matters having been addressed and in view of the foregoing, Applicants respectfully request the entry of this Amendment, the Examiner's reconsideration of this application, and the immediate allowance of all pending claims.

Please charge any fees associated with the submission of this paper to Deposit Account Number **033975**. The Commissioner for Patents is also authorized to credit any over payments to the above-referenced Deposit Account.

Respectfully submitted,

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